1 2 3 4 5 6 7	BEVAN J. MAXEY Maxey Law Offices, PLLC Attorneys for Defendant 1835 West Broadway Spokane, WA 99201 (509) 326-0338 (509) 325-4490
8	IN THE UNITED STATES DISTRICT COURT
9	FOR THE EASTERN DISTRICT OF WASHINGTON
10	AT SPOKANE
11	UNITED STATES OF AMERICA,)
12	Plaintiff,) NO. 2:21-CR-00164-TOR-3
13	- vs -) CHARACTER LETTERS
14	ON BEHALF OF
15	WILLIAM H. BURNS,) DEFENDANT Defendant.)
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1 CERTIFICATE OF SERVICE 2 I, Alexa Actor-McCully, hereby certify that on November 15, 2022, I 3 electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following, and/or I hereby 4 certify that I have mailed by United States Postal Service the document to the 5 following non-CM/ECF participants(s): 6 Caitlin Baunsgard 7 Assistant United States Attorney West 920 Riverside, #300 8 Spokane, WA 99201 9 10 /s/ Alexa Actor-McCully 11 12 Alexa Actor-McCully 13 14 15 16 17 18 19 20 21 22 23 24

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November 14, 2022

Your Honor,

I am Christy Sireika. I write this letter on behalf of my son, William Burns. William has had a challenging life. William witnessed violence at a young age to the point, not just his biological father, but his paternal grandmother were both court-ordered to have no contact with William or our household. It never stopped them from popping up here and there long enough to cause chaos and disappear again. His biological father has since passed away along with the paternal grandmother. I watched William grow up confused, sad, and at times angry.

William has had to overcome a lot of loss. Both my parents have passed along with my 2 siblings. We have a very small family unit. I remarried 24 years ago and my husband helped raise William and show him what a loving home looks like. I think it was tough for William to balance the new family and his memories of his father.

Despite it all, William played sports all through school — even quarterback in high school. Regrettably, William found himself mixed up in some bad company. He did graduate high school and it was one of my proudest moments. Over the years, William made some bad decisions and we concluded to truly be able to start over he needed to leave Reno and start new.

William moved in with his paternal step-grandfather In Idaho and they became extremely close. Unfortunately, he passed away from Covid which tore William apart and sent him into a depression. William eventually fell on hard times. I believe this is when he got mixed up with the influences that he ran into on that night in question. After William spoke to the Spokane Police and was cleared, he decided enough is enough and he needed to get it together for good. And he did! He moved back to Idaho, and got a job at Fed Ex, his bosses love him and continually tell him he is the hardest worker. He met his girlfriend Felise there and it wasn't long before he stepped up to be a father figure to Felise's, then 2-year-old, daughter. They rented a house together and began to build a life.

William was quickly accepted into Felise's family. William does odd jobs for them to help out and attended several family functions. Mostly the day-to-day consist of William and Felise and her daughter -going to the park or doing crafts and activities and yard work! They attend church regularly and share a ride to work since they have the same hours. I looked forward to the morning calls every day on their ride home from work. It warmed my heart to hear them laughing and interacting. William has turned his life around and gets emotional just talking about it. William wants nothing more than to be back to his family and work hard to provide for them. William has worked so hard to begin this new life he would never walk away from it or do anything to chance losing it. He is not a flight risk or a danger to the community.

I would sincerely like to vouch for the good character of my son. William has grown into a fine gentleman with a kind, loving heart. William has shown he is ready to be a hard-working member of society. I strongly believe he is remorseful for his past and will not repeat these mistakes going forward. William is solely focused on his recovery from the past and his new life with Felise and her daughter.

Sincerely,/

Christy Sireika

November 14, 2022

Your Honor,

My name is Carlee Sireika. I am 23 years old and scheduled to graduate with a Bachelor of Nursing in December 2023. I'm writing in support of my brother, William Burns. My brother and I are very close. Over the years, my brother has gone through a lot, but somehow was always there for me. He always encouraged me to do well in school and keep my straight A's. It was tough not seeing him as often when he moved to Idaho to begin a new life. Moving there he seemed to have a new spark in his life while he was able to live with and help take care of his grandpa; his heart grew bigger when he was given the opportunity to be of service to someone else. I believe that he wasn't sure how to handle the loss of a loved one when he passed.

When he found his current girlfriend named Felise, things really began to take off. I saw a newfound light in his eyes that I've never seen before. I have never seen him as happy as he is being with Felise and her daughter. My brother began going to church, planning family barbeques with Felise's family, and saving his money to give a good present to Felise's daughter. He was putting everything he had into his new, blessed life. He is working full time and living as a hard working member of society.

I am asking that you please consider my letter when reviewing William's file. He is not a danger to society. My brother has made mistakes, but it's not who he is at his core. My brother is a thoughtful, generous, caring, and loving man. He has turned his life over to God and really needs a chance to prove he is a man of his word. I believe that he will continue his path of being a devoted family man. He is not a flight risk and is not a danger to society. Please let him go home to his family while this case is pending.

Sincerely,

Carlee Sireika

To Whom It May Concern,

This letter is addressed to whomever may be associated to the situation regarding William Burns. While I am somewhat ignorant to the exact details of the aforementioned issues he is dealing with, I would like to attest to the character he displayed while employed at FedEx Ground.

As soon as William walked through the door he only exhibited the qualities of an upstanding, motivated and hardworking man. His punctuality was never in question, whether it be through illness or minor hardship and was one of, if not my most, dependable employee. Every day he was at work he took the time to befriend his peers and form good rapport to the benefit of all around him. It is common in warehouse environments to run into questionable behavior through either lack of engagement or general contempt for others, but this was not William. As well as being pleasant to be around, he seemed to have an innate drive to outwork and do better every day, a regrettably uncommon trait. I could always count on him to do what nobody else wanted to without retaliation or disdain.

While I don't know much about where William came from, my intuition told me he was on a path of betterment due to his marked motivation and care for our small community. It is my hopes this short testament may aid in his situation as I truly believe Mr. Burns to be a kind person with great potential in our society.

With Gratitude,

Trevor Jones

Operations Manager

jones.trevor.a@gmail.com

November 14, 2022

Your Honor.

I am Felise Hall. I am William Burns' girlfriend. I write this letter in support of William and in hopes that he can be released pending trial on this matter. William is a good man. I understand that he has not always made good decisions in his life, but he has changed. William has been nothing but good to me and my family. He has stepped up as a partner for me in many ways. He helps me pay the bills at our home, he is a very hard worker, he is kind, respectful, and he always goes above and beyond for my daughter and I. William has chosen to be a father figure to my daughter. He is a wonderful father figure. He loves my daughter as his own and treats her as such.

My relationship with William has been family-oriented. William plans get togethers with my family and joins us at my family's events. He goes to church with me and my family. He has accepted God into his heart. His relationship with God continues to go closer to God every day. We have our marriage license and have been planning on getting married very soon. This whole situation has been a setback for our plans together. I couldn't imagine my life without him and he cannot imagine his life with out us.

We are creating lasting loving memories and trying to live our busy lives to the fullest together.

William is now a true family man. William has really made a big impact on all of us. William is not a flight risk. If he is released, he can continue to live with me in Boise and work at Fedex, where we both work. He is a good employee and receives many praises from the managers and supervisors. William is not a danger to the community. He has a good support system here in Boise with my family and he has support from his mother and step-father.

I ask you to allow William to return home to his family while this case is pending. I will make sure he attends all of his court dates and follow any release conditions ordered by the court.

Sincerely,

Felise Hall